To: FCC

Subject: Comment to NPRM WT 05-235

1. Morse Code (CW) is an essential communication method and should remain a test requirement for access to Amateur HF frequencies. CW is among the most bandwidth efficient and effective communications modes available to the Amateur radio operator. CW communication will succeed when other methods fail. Emergency communications will be severely compromised if an operator does not have the ability to communicate using Morse Code.

2. Manual radiotelegraphic (CW) communications has not been superceded by more modern methods of communication. There are no other methods of communication as reliable, accurate, fast, and efficient.

3. Requiring manual telegraphy proficiency is entirely compatible with the radio amateur's mandated objective of contributing to the advancement of the radio art. To that end, a manual key and a simple, homebrew transmitter/receiver is all that is required for communication with CW as compared to the increasingly sophisticated equipment for all other modes. All other modes of operation require far more sophisticated equipment than does CW and is far more difficult to construct.

4. FCC evidence exists that proves Morse Code (CW) proficiency is an indicator of a desirable, motivated, and better qualified operator. Proficiency at Morse Code demonstrates that the operator has worked hard to earn HF privileges and is dedicated to the art and science of Amateur Radio. The overwhelming majority of violations of the FCC code governing Amateur Radio concern operation in the VHF/UHF spectrum, often involving repeaters, and Technician class operators. I have seen only one alleged violation by a CW operator. (ref. “FCC Amateur Radio Enforcement Letters”, as posted on the ARRL web site).

5. The Morse code requirement serves as an advancement barrier to no one. Those who put forth the effort will achieve. Those who won’t aren’t serious enough about becoming an Amateur Radio operator.

6. The value of Morse code communications in the Amateur Service is primarily recreational in nature, as are all other modes, and manual telegraphy proficiency should continue to be a compulsory licensing requirement for any class of Amateur Radio license.

7. The most challenging problem is maintaining the standards of the Amateur Radio service. While lowering the standards (eliminating CW testing) may increase the number of licensed operators temporarily, quality will surely suffer. Morse Code operation teaches good operating skills (e.g. courtesy, perseverance, patience, etiquette, etc.) far better and faster than any other mode. Furthermore, it proves you don’t need maximum allowable power to communicate, as is evidenced by the hundreds of contacts made daily using simple equipment (homebrew or kit) at power levels at or below 5 watts.

8. Some will lament they have been ostracized, belittled, etc. because they don't know Morse Code. I can only theorize that these folks have brought this criticism on themselves through a loudly expressed disdain for Morse Code and lack of desire to exert the effort to learn.

9. The fact that many Technician and Technician Plus licensed operators are MARS operators and operate HF with their MARS License prove that they have learned the basic military protocols and etiquette for operating in a military environment and passing military health and welfare traffic. MARS is a fine organization that has developed thousands of highly proficient operators. Therefore, I propose that all applicants for a General class license either pass a 10 WPM CW exam or the equivalent of the MARS Operator training course.

10. It is time to stop the down-hill slide of proficiency and quality in Amateur Radio. Let's raise the standard rather than lower it for a change. Clearly, the IARU left the decision to retain or eliminate the Morse Code testing requirement to each member nation. To date, approximately 8% of nations have done so. It is worth noting that Japan retained a CW testing requirement.

11. We clearly need to retain Morse Code testing for advancement to HF operating frequencies. Poor operating practices on VHF/UHF are an embarrassment to the local community but, on HF they are a national and international embarrassment. This is our opportunity for the USA to rise above the world wide trend in lowering standards. Let's establish our leadership instead of following the crowd.

Sincerely,
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